



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AH

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 26, 2011

By ECF and Email

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Re: United States v. Anthony Romanello  
Criminal Docket No. 10-929 (ILG)

Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

In or about and between November 1998 and January 2000, a cooperating witness ("CW#1") consensually recorded conversations with various members and associates of La Cosa Nostra, among others. By letters dated August 25, 2011, August 29, 2011, and September 9, 2011, the government provided you with a list, consensually recorded conversations made by CW#1 available at DupeCoop. Below is a list of additional consensually recorded conversations made by CW#1 that are also available at DupeCoop.<sup>1</sup> You may obtain these materials by contacting John Palermo at (973) 895-1359.

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<sup>1</sup> Listed recordings followed by an asterisk ("\*") are available in digital copy. The remaining recordings are available on audiocassette tapes.

<b>Ex.</b>	<b>Description</b>
1D199*	Consensual recording made on 8/3/99
1D331	Consensual recording made on 11/5/99
1D368*	Consensual recording made on 1/16/00

Attached to this letter is an index of the consensually recorded conversations that have been produced to date, including information regarding individuals who may have been recorded during those conversations.<sup>2</sup>

In addition, the government is in possession of the following two consensually recorded conversations made by CW#1 that, due to technical difficulties, the government has been unable to open or review.<sup>3</sup>

<b>Ex.</b>	<b>Description</b>
ID75	Consensual recording made on 4/21/99
ID379	Consensual recording made on 12/2/99

If you wish to have access to these recordings, please contact us to arrange a mutually convenient time to do so.

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<sup>2</sup> Although not obligated to do so, the government created this index as an aid and at your request. The government does not guarantee the accuracy or completeness of the information in the index.

<sup>3</sup> ID75 is an Apple brand floppy disk. ID379 is a copy of an original recording on a CD. According to internal FBI documents, ID75 is a consensually monitored conversation between CW#1 and Joe Merollo, and ID379 is a consensually monitored conversation between CW#1, Glenn Guadagno, Ida Guadagno and Richie Guadagno regarding money laundering.

Please contact us if you have any questions regarding the above disclosures.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/Amanda Hector  
Amanda Hector  
Jack Dennehy  
M. Kristin Mace  
Assistant U.S. Attorneys

cc: Clerk of the Court (ILG) (without enclosures)